

Cremata, Claire

From: Fernandez, Dr. Enrique
Sent: Sunday, April 23, 2006 5:17 PM
To: Anand Dasrath
Cc: Coutinho, Ronnie; Cremata, Claire
Subject: RE: [a1cm62]Course Grades Posted

Please contact Claire Cremata on Monday to schedule a teleconference to review your AICM performance: 305-804-7803

From: Anand Dasrath [mailto:anand_dasrath@yahoo.com]
Sent: Sat 4/22/2006 4:45 PM
To: Fernandez, Dr. Enrique
Subject: Re: [a1cm62]Course Grades Posted

Dr. Fernandez,

I see a failing grade as my final grade. Please check: 1) I do not see an updated grade for my Epi/Biostatistics grade, only the first failing grade of 50/76 is there. What happened to the remediated grade? 2) 36% for the final essay is very unconsciable. The person that marked it did not do a fair job. I knew what was asked and what the answers were: my poor penmanship may have annoyed the marker but not a reasonable excuse to get a failing grade. 3) Please look again at my second case write up - under subjective conditions such as this any reader can give any essay a c- and cause the student a failing final grade. 4) How did I end up with a 36/50 in the extra-credit after 10 points were allocated for staying to the end of the soap notes lecture (which I did), 10 points for notifying you on time which I did, I wrote my soap, presented it and answer all the questions correctly except for one: "what is LOC (loss of consciousness)?"

I humbly ask that you review the components of my grade. I already passed my comprehensive examination, already moved back to New York, and is already preparing for my USMLE Step 1. If there is any other steps you would like me to take that would complete course please let me know.

Thanks,

Anand Dasrath.

"Fernandez, Dr. Enrique" <ESFernandez@rossmed.edu> wrote:

AICM Course grades are posted on eCollege. Grade breakdowns will be available by email request starting Monday. If you would like your second write-up back, you may pick it up from Alvaro Rosales starting Monday. If you are not in Miami, you may send an email to Mr. Rosales and provide him with a mailing address to send your write-up: ARosales@rossmed.edu

Grade Distributions:

28 percent "A"
18 percent "B+"
17 percent "B"
13 percent "C+"
19 percent "C"

Exhibit H

Exhibit I

Exhibit J

Exhibit K

Exhibit L

MEMORANDUM FOR THE RECORD - April 24, 2006

Dr. Fernandez conferred today by telephone with Anand Dasrath about the failing grade he earned for the 5th semester just concluded. Dr. Fernandez informed Anand that he was essentially two Standard Deviations from the norm. He said that Anand earned a C on the midterm exam, failed the final exam and had a very low score on the essay portion (63 out of a possible 200). He remarked that the lowest grade had been 61. He told Anand that he failed the first write-up and got a marginal on the second. He said that would have been okay had everything else also been okay. He noted that Anand failed the PE and had remediated that. He said that Anand's overall grade placed him at the bottom of the class. He reminded Anand that extra credit cannot be applied to a failing grade.

Dr. Fernandez told Anand that he would have to repeat the semester.

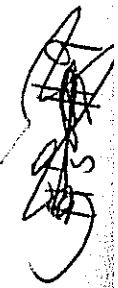
- May start May 22
- Will do three weeks of clinicals
- Must do one write-up until a grade of Satisfactory or better is achieved
- Is exempt from Epi and the PE
- Must attend Large and Small Group sessions (except for Epi)
- Must take Mid-term and Final

Dr. Fernandez told Anand that he would get individualized attention to help him succeed.

Dr. Fernandez noted that Anand passed the Comp. He pointed out that he could, if he wishes, defer starting 5th semester until September, freeing up the interval for preparing for Step 1. He said that if he chose to come in May he could extend his Step 1 window to July, August, September.

Anand asked how he could have scored so poorly on the essays and said he worried that his handwriting had challenged the graders. Dr. Fernandez said that he had graded two of the seven essays himself. He did not recall trouble with anyone's handwriting and had not heard of a problem from anyone else. He reported that on the stroke essay Anand earned 5 out of a possible 25 points; on Graves got no points, none for hepatitis, on sexual issues and HIV about the average, 20 of 50 on essay #7...

Anand asked if he would have to repeat the semester in its entirety. Dr. Fernandez explained that he would have to do the components listed above. Anand wondered if Dr. Fernandez knew that he had spent some 22 years in hospitals as a pharmacist and that, consequently, he found the clinical activities to be not meaningful. Dr. Fernandez said he regretted that Anand had not mentioned his dissatisfaction earlier but promised to make sure to work closely with Anand to ensure the relevance of the activities he is assigned. In answer to Anand's question, he said that he would be responsible for full tuition but would be eligible for financial aid.



DA002

BANNER	LAST NAME	FIRST NAME	MT GRDE	MT Pts	FMC ADJ	F Essay	adjusted	Wur	W Pts	letter2
@00088730	Dasrath	Anand	C	75	103	63	fail	FF	0	CF

DA001

11/5/11

AICM

COPY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
- - - - -
ANAND DASRATH,

Plaintiff,

-against- Case No.
CV-07-2433

ROSS UNIVERSITY SCHOOL OF MEDICINE,

Defendant. - - - - - X

October 21, 2010
9:55 a.m.

44 Wall Street
New York, New York

DEPOSITION OF DR. ENRIQUE S. FERNANDEZ,
appearing as a witness on behalf of the Defendant
herein, taken by the attorneys for Plaintiff,
Pursuant to Notice, held at the above-mentioned
time and place, before Alec Dzenski, a Notary
Public in and for the State of New York.

*** ** ***

SEVERIN & ASSOCIATES, INC.
1 South View Court
Bayville, New York 11709
TEL. (516) 628-1402 - FAX (516) 628-0423

13

Dr. Fernandez - Direct

A No.

MR. COSTELLO: Can we have this marked
as Plaintiff's Exhibit 6.

(Whereupon, Plaintiff's Exhibit 6 was
marked for Identification, this date.)

Q Dr. Fernandez, you have now in front
of you what's been marked as Plaintiff's Exhibit
6. Do you recognize this document?

A Yes.

Q Can you please tell me what this
document is?

A It's the statement of the director of
medical education.

Q Is that your signature at the bottom?

A That is my signature.

Q Can you please read what the document
says?

A I hereby certify that, banner ID
number, Dasrath, Anand completed twelve weeks
in advanced introduction of clinical medicine
at Greater Miami Health Education and Training
Center Hospital.

This document goes to the registrar,
it does not go to the student.

SEVERIN & ASSOCIATES, INC. * (516) 628-1402

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
3 - - - - - X
4 ANAND DASRATH,

5 Plaintiff,

6 -against-

7 Case No.
8 CV-07-2433

9 ROSS UNIVERSITY SCHOOL OF MEDICINE,

10 Defendant.

11 - - - - - X

12 October 21, 2010
13 9:55 a.m.

14 44 Wall Street
15 New York, New York

16
17 DEPOSITION OF DR. ENRIQUE S. FERNANDEZ,
18 appearing as a witness on behalf of the Defendant
19 herein, taken by the attorneys for Plaintiff,
20 Pursuant to Notice, held at the above-mentioned
21 time and place, before Alec Dzenski, a Notary
22 Public in and for the State of New York.

23 *** ** ***
24
25

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COPY

Dr. Fernandez - Direct

Q When was this forwarded to the registrar?

A The date of the first page which is the evaluation.

Q Are you referring to another document that's associated with this certification?

A Yes. The evaluation is the first page of the evaluation, course evaluation. This attests to the fact that Mr. Dasrath was there for a period of twelve weeks in Miami.

Q And he completed the AICM, correct?

A He completed twelve weeks in advanced introduction of clinical medicine.

Q Again, the advanced introduction of clinical medicine is the AICM?

A Fifth semester, yes, AICM.

Q After completion of the AICM in the early part of April of 2006, how far after completion are grades issued?

A I think I answered that already.

Q And the grades are then posted?

A At that time they were posted and I believe they still are posted on eCollege.

Q Were they posted anywhere in the

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Exhibit P

13 COPY

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
3 - - - - -
4 ANAND DASRATH,
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Plaintiff,

-against- Case No.
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Bayville, New York 11709
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Dr. Fernandez - Direct

1 the next phase of the education, the student must
2 pass step one.
3

4 Q What is required in order to be
5 certified to sit for step one?

6 A A passing score on the National Board
7 of Medical Examiners Comprehensive Examination
8 and satisfactory progress in the curriculum.

9 Q Is that the NBME?

10 A One in the same.

11 Q Are you aware that Mr. Dasrath had
12 passed or was able to sit for the National Board
13 of Medical Exams?

14 A I'm aware that Mr. Dasrath passed the
15 comprehensive basic science examination and I'm
16 aware that he was certified and sat for step one.

17 Q Of the USMLE step one?

18 A Yes.

19 Q In order to be able to sit for the
20 USMLE step one, obviously he had to pass the

21 AICM?

22 A Yes.

23 Q And you're aware that he took the

24 USMLE?

25 A Yes.

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COPY

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2 EASTERN DISTRICT OF NEW YORK
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4 Plaintiff,

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Bayville, New York 11709
TEL. (516) 628-1402 - FAX (516) 628-0423

Dr. Fernandez - Direct

Q Do you know when he took it?

A I don't know the date.

Q Just for edification, what is the United States Medical Licensing exam?

A It is one of the examinations that is required for graduation from Ross University and to obtain the M.D. degree. It's also a required examination for ECFMG certification.

Q Do you know what ECFMG stands for?

A Educational Commission for Foreign Medical Graduates. ECFMG is the process whereby international medical graduates or students who go to Ross University as an international medical school certifies the graduate's ability to enter residency training.

Q Do you know the results of Mr. Dasrath's USMLE step one exam?

A I do not. Would this be an appropriate time to take a break?

MR. COSTELLO: Yes.

(Whereupon, a brief recess was taken.)

BY MR. COSTELLO: (Continuing.)

Q Dr. Fernandez, in order to sit for the USMLE a student has to be certified in the

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Dr. Fernandez - Direct

AICM, correct?

A A student has to pass AICM.

Q But he has to be certified before he could take the USMLE, correct?

A Yes.

Q And you administered the AICM and issued a failing grade?

A I'm a little confused here.

Q You were the professor that administered the AICM course; is that correct?

A Yes, but I'm not the person who certified Mr. Dasrath for the USMLE.

Q But you issued the failing grade in the AICM, correct?

A Mr. Dasrath earned a failing grade based on the scores in the ICM, yes.

Q So yes, you issued the failing grade?

A I forwarded a failing grade to the registrar, yes.

Q If he received an F he would not have been certified to take the USMLE, correct?

A He would not have been eligible to sit for USMLE and should not have sat for USMLE step one.

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
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ANAND DASRATH,

Plaintiff,

-against-

Case No.
CV-07-2433

ROSS UNIVERSITY SCHOOL OF MEDICINE,

Defendant.

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Dr. Fernandez - Direct

again Mr. Dasrath's instructor?

A No, because he never returned to repeat the fifth semester.

Q Was he enrolled in a clinical clerkship?

A No.

Q Can you please tell me what a clinical clerkship is?

A A clinical clerkship is a rotation that follows the successful passing of step one and is part of the 78 weeks after fifth semester that a student completes clinical activities at assigned hospitals as part of the 150 weeks required for graduation.

Q Where would the assigned hospitals be?

A At any one of our affiliates in the United States and/or Princess Margaret Hospital in Dominica.

Q Was Mr. Dasrath ever assigned to a hospital for clinical clerkship?

A No.

Q How long are clinical clerkships?

A They vary in duration from required clerkships of six weeks to required clerkships of

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X Index No.: CV 07-2433

ANAND DASRATH

Plaintiff (s),

-against-

DEMANDS FOR REQUESTS

ROSS UNIVERSITY SCHOOL OF
MEDICINE,

Defendant (s).

-----X

Plaintiff, ANAND DASRATH, by and through his attorneys, COSTELLO & COSTELLO, P.C. serves the following requests for production of documents upon the Defendant, ROSS UNIVERSITY SCHOOL OF MEDICINE to be responded to, pursuant to Fed. R. Civ. P. 34, within 30 days after the date of service.

INSTRUCTIONS FOR RESPONDING

1. Plaintiff, ANAND DASRATH incorporates Local Civil Rule §26.3 of the Federal Rules of Civil Procedure as the instructions and definitions applicable herein.
2. The word "document" shall include electronic (computer), files, e-mails, voicemail messages, audio recordings and any other items that may be contained in Defendants records or Defendants computer system that relate in any way to matter in dispute.

REQUESTS FROM DEPOSITION OF DR. NANCY PERRI

1. Any documentation reflecting the cost of tuition for attendance to the Medical School for 2006.
2. A copy of the Ross University School of Medicine Catalog.
3. A list of the names of the faculty members teaching the clinical rotation course in 2006.
4. Complete name and address of Michael Rendon's current employer.
5. A copy of the exam sheet for the AICM for the Plaintiff, ANAND DASRATH

REQUESTS FROM DEPOSITION OF DR. ENRIQUE FERNANDEZ

1. Copies of the Plaintiffs midterm and final exams in Scantron.
2. Any copies of midterm and final exams that were given to the Plaintiff
3. Copies of all the portions of the AICM exams taken by the Plaintiff.

4. A copy of the semester report from E-College for the Plaintiff
5. A copy of the first spreadsheet reflecting the Plaintiffs grades on the AICM exams.
6. A copy of any and all extra credit material that was submitted by the Plaintiff, as well copies of any and all exams the Plaintiffs failing grades.
7. A copy of the spreadsheets pertaining to the Plaintiffs grades.
8. A copy of the class mean standards.

THE PLAINTIFF(S) RESERVE(S) THE RIGHT TO SUPPLEMENT THIS RESPONSE UP TO AND INCLUDING THE TIME OF TRIAL IN THIS MATTER.

Dated: Brooklyn, New York
December 14, 2010

COSTELLO & COSTELLO, P.C.
By: JOSEPH R. COSTELLO, ESQ.
Attorneys for Plaintiff
5919 20th Avenue
Brooklyn, New York 11204
(718) 331-4600
Our File No. 6970

TO: **CULLEN AND DYKMAN, LLP.**
JENNIFER A. MCLAUGHLIN, ESQ.
100 Quentin Roosevelt Boulevard
Garden City, New York 11530
(516) 357-3700

I N D E X

WITNESS	EXAMINATION BY	PAGE
ANAND DASRATH	MS. McLAUGHLIN	4

E X H I B I T S

DEFENDANT'S	DESCRIPTION	PAGE
A	Document	13
B	Copy of transcript	20
C & D	E-mails	47
E	Transcript	57
F	E-mail	87
G	Memo	99
H	E-mail	111
I	Letter	115
J	Transcript	118
K	Letter	121
L	Letter	123
M & N	USMLE application	129
O	Affidavit	135
P	Handbook	140
Q	Letter	144
R	Letter	145
S	Affidavit in opposition	150

1 A. DASRATH

2 Q. What happened at that time with
3 your incomplete with the pathology one
4 course?

5 A. It was changed from an
6 incomplete to a C.

7 Q. Before you started the AICM
8 class?

9 A. Right around then. I don't
10 recall the exact date.

11 Q. How did you find out it was
12 changed to a C?

13 A. I received a transcript.

14 Q. The AICM course that you were
15 taking, do you remember what your grades were
16 based on?

17 A. It was based --

18 MR. COSTELLO: For the AICM?

19 Q. For the AICM.

20 A. Test.

21 Q. Test only or was there a
22 practical portion of the course?

23 A. On many things. Plastic
24 things that looks like human.

25 Q. You had taken the exams for the

COPY

UNITED STATES DISTRICT COURT
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1 South View Court
Bayville, New York 11709
TEL. (516) 628-1402. - FAX (516) 628-0423

1
2 Dr. Fernandez - Direct 59
3 evaluation form.

4 Q Is that your signature at the bottom?

5 A Yes, it is.

6 Q The address at the bottom of that
7 document, is that the address for the Greater
8 Miami Health Education and Training Center?

9 A No. That's our sponsoring institution
10 accredited through Florida.

11 Q What is the address there, the 7000?

12 A That's my office, that's the program
13 office for AICM.

14 Q This clinical clerkship evaluation
15 form states that the duration of it was for
16 twelve weeks, correct?

17 A Correct.

18 Q What were the dates to the right of
19 the number twelve?

20 A January 16th, 2006 to April 7th, 2006.

21 Q This is for Anand Dasrath, correct?

22 A Yes.

23 Q Who would place this picture?

24 A The staff member.

25 Q Staff member where, at the registrar's
office?

SEVERIN & ASSOCIATES, INC. * (516) 628-1402

Exhibit V

ROSS UNIVERSITY SCHOOL OF MEDICINE
STUDENT HANDBOOK
OF
ACADEMIC RULES AND REGULATIONS

May 2006



ROSS
UNIVERSITY
SCHOOL OF MEDICINE

The Basic Science segment consists of 60 credits of specifically prescribed coursework. There are four semesters of Basic Science classes, for a total of two academic years. All Basic Science coursework is offered on the School of Medicine campus (located at Portsmouth, in the Commonwealth of Dominica) and must be satisfactorily completed there. The hours, credits, and credit limitations are strictly prescribed. Deviation from these standards may jeopardize a student's eligibility for licensure in the United States. Basic Science students taking 10 semester credit hours are considered full-time; students who are taking less than 12 semester credit hours (see *Remedial Semesters* under Promotions Policy) may not satisfy enrollment requirements of sponsoring organizations, outside health insurance plans, and other related services.

The Clinical Science curriculum consists of 90 weeks of clinical training. It begins with an introductory clinical segment of 12 weeks, the course "Advanced Introduction to Clinical Medicine"(AICM). This segment provides training in the basic clinical skills combined with an introduction to the pathophysiology of major disease processes, and is conducted in clinical facilities, in the U.S.

The remaining 78 weeks consist of 48 weeks of required ("core") clerkships and 30 weeks of elective clerkships as described in the *Catalog*. During this time, the student participates in patient care while rotating through various medical specialties in affiliated teaching hospitals and other approved health care facilities, in the United States. Clinical clerkships are performed under the guidance of clinical faculty, the Dean of Clinical Sciences and Student Affairs and the Executive Dean and under the general supervision of the School of Medicine's Dean of Clinical Sciences.

ACADEMIC STANDARDS

PROMOTIONS COMMITTEE, PROMOTIONS

All academic matters, including grading policies and academic standards, while students are pursuing the Basic Science portion of the curriculum (the first two academic years), are within the purview of the School's Promotions Committee. This committee acts within the framework of the policies set forth herein. It is a faculty committee, whose recommendations are transmitted to the Dean. The decision of the Dean is final.

STUDENT GRADING AND PROMOTIONS POLICIES GRADING POLICY FOR THE BASIC SCIENCE SEGMENT

The aim of the policy is to establish a minimum acceptable performance that a student must achieve that does not depend on the performance of the entire class. A Minimum Passing Score (MPS) is established that must be achieved for a passing (C) grade. A well-established method (the "Hofstee" method) will be used to determine the MPS.

The Hofstee method utilizes the class performance but also sets a Minimum Passing Score (MPS) that is derived from the lower group of scores within a defined range. The range for the MPS to be used is between 55% and 65%. Therefore, students that enrolled after May 2004 scoring below 55% will have failing scores and those scoring above 65% will have passing scores. Students with scores between 55% and 65% have marginal performance that may result in course failure

depending on the performance among the lowest performing group of students (in the range of 55% and 65%).

Recorded grades will be on an A (80 and higher), B (70-80), C (MPS-69), F (below MPS).

The percentage contribution to the final course score from each of the interim (mini) exams and other course evaluations will be announced by each course in advance. The final course score will include the student's score on a NBME subject examination (taken at the end of the course). The final course score weight from the NBME subject exams will be announced by each course director in advance.

GRADES

Grades are interpreted as follows:

A	80-100	4.00
B	70-80	3.00
C	MPS-69	2.00
F	Failing	0.00
W	Withdrawn Before Interim Exams	0.00
WP	Withdrawn Passing	0.00
WF	Withdrawn Failing	0.00
I	Incomplete	0.00
SP	Satisfactory Progress	0.00
UP	Unsatisfactory Progress	0.00

Withdrawal from a single course during a semester is not permitted.

A student electing to withdraw from the School prior to the time of the first examinations will receive grades of W on his/her transcript. Those leaving after taking one or more interim examinations will receive WP (withdrawn passing) grades or WF (withdrawn failing), based on their performance in the examination(s) taken.

A student that is granted an emergency absence resulting in an Academic Leave of Absence prior to the time of the first exam will receive grades of W. Those leaving after taking one or more interim examinations will receive WP (withdrawn passing) grades or WF (withdrawn failing), based on their performance in the examination(s) taken.

An I (Incomplete) grade is entered when a student is advanced, pending completion of a requirement of a course, as defined by the course director. In this case, the outstanding requirement must be completed the following semester and the I will be changed into a grade. Failure to do so will result in a grade of F being entered to replace the I.

Students, who maintain grades of A in all courses in two successive semesters, will qualify for the *Dean's List*. They will remain on the *Dean's List* as long as they do not receive a grade below B in subsequent semesters. The *Dean's List* will be posted at the beginning of every semester, as soon the grades are available from the previous semester. This applies for semesters 2-4.



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WITNESS	EXAMINATION BY	PAGE	
ANAND DASRATH	MS. McLAUGHLIN	4	

E X H I B I T S			
DEFENDANT'S	DESCRIPTION	PAGE	
A	Document	13	
B	Copy of transcript	20	
C & D	E-mails	47	
E	Transcript	57	
F	E-mail	87	
G	Memo	99	
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Q	Letter	144	
R	Letter	145	
S	Affidavit in opposition	150	

1 A. DASRATH

2 on the wall.

3 Q. And there is no way to access
4 it electronically or otherwise?

5 A. I don't recall that.

6 Q. So, the first time you found
7 out about your grade in pathology was in
8 August of 2005?

9 A. Yes, pathology one.

10 Q. Pathology one, I'm sorry.

11 What did you find out in August
12 of 2005?

13 A. I received grades for the other
14 three courses, but not pathology one.

15 Q. Did you call someone or talk to
16 someone about this?

17 A. Yes.

18 Q. What was discussed? I'm
19 sorry, who did you speak to?

20 A. Dr. Desalu.

21 Q. And Dr. Desalu, if you
22 remember, was in charge of the grading center
23 at the school; is that correct?

24 A. Yes.

25 Q. What did you say to Dr. Desalu?

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17 DEPOSITION OF DR. ENRIQUE S. FERNANDEZ,
18 appearing as a witness on behalf of the Defendant
19 herein, taken by the attorneys for Plaintiff,
20 Pursuant to Notice, held at the above-mentioned
21 time and place, before Alec Dzenski, a Notary
22 Public in and for the State of New York.
23
24
25

*** ** ***

SEVERIN & ASSOCIATES, INC.
1 South View Court
Bayville, New York 11709
TEL. (516) 628-1402 - FAX (516) 628-0423

1
2 Dr. Fernandez - Direct 59
3 evaluation form.

4 Q Is that your signature at the bottom?

5 A Yes, it is.

6 Q The address at the bottom of that
7 document, is that the address for the Greater
8 Miami Health Education and Training Center?

9 A No. That's our sponsoring institution
10 accredited through Florida.

11 Q What is the address there, the 7000?

12 A That's my office, that's the program
13 office for AICM.

14 Q This clinical clerkship evaluation
15 form states that the duration of it was for
16 twelve weeks, correct?

17 A Correct.

18 Q What were the dates to the right of
19 the number twelve?

20 A January 16th, 2006 to April 7th, 2006.

21 Q This is for Anand Dasrath, correct?

22 A Yes.

23 Q Who would place this picture?

24 A The staff member.

25 Q Staff member where, at the registrar's
office?

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Dr. Fernandez - Direct

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DR. ENRIQUE S. FERNANDEZ, the witness herein,
after having first been duly sworn by
Alec Dzenski, a Notary Public in and for
the State of New York, was examined and
testified as follows:

DIRECT EXAMINATION

BY MR. COSTELLO:

Q Can I have your full name for the
record, please?

A Enrique S. Fernandez.

Q What is your business address?

A 7000 Southwest 62nd Avenue, Penthouse
A, Miami, Florida, 33143.

Q Good morning, Dr. Fernandez. How are
you today?

A I'm well. And yourself?

Q Good, thank you. My name is Joseph
Costello and I represent the Plaintiff, Anand
Dasrath, in a lawsuit that has been brought
against Ross University. Today I'm going to be
asking you some questions with regard to that
lawsuit.

As you see, we have a court reporter
here who's taking down everything that we say, so

SEVERIN & ASSOCIATES, INC. * (516) 628-1402

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
3 - - - - - X
4 ANAND DASRATH,

5 Plaintiff,

6 -against-

7 Case No.
8 CV-07-2433

9 ROSS UNIVERSITY SCHOOL OF MEDICINE,

10 Defendant.

11 - - - - - X

12 October 21, 2010
13 9:55 a.m.

14 44 Wall Street
15 New York, New York

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COPY

Dr. Fernandez - Direct

there in the clinical department.

Q What is your title at Ross?

A Senior associate dean for clinical sciences.

Q How long have you been employed at Ross University?

A Since 2003, January.

Q As a senior associate dean for clinical sciences?

A No. I've been in this position for two years.

Q What was your position prior to this?

A Associate dean and director of the advanced introduction to clinical medicine course, fifth semester.

Q Is that the AICM?

A AICM.

Q How long were you the director of the AICM course?

A Since its inception in 2001.

Q So in 2006 what was your position with Ross?

A I was the associate dean for clinical sciences and I was the director of the advanced

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60

Dr. Fernandez - Direct

A In Miami.

Q You said before that he wasn't enrolled in a clinical clerkship, correct?

A He was not enrolled in the clerkships that I just described to you, counselor, the core rotations or the elective rotations.

Q But the programs you described to me all dealt with the clinical clerkship, correct?

A AICM is also a clinical clerkship.

Q And the AICM, is it a core or is it an elective clinical clerkship?

A It is neither.

Q What kind of clinical clerkship is it?

A It is a clinical experience, clinical rotation that students must do prior to progressing to the core and electives.

Q So he would still be enrolled in a clinical clerkship though?

A Yes. The form is called a clinical clerkship. If I confused you, I apologize.

AICM is a clinical experience and it is a clinical clerkship. It is not a core rotation and it is not an elective rotation.

Q After the completion of this clinical

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3 COPY

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